



EPA Region 5 Records Ctr.



314017

Environment Health & Safety, WTC 2G2
PO Box 9777
Federal Way, WA 98063-9777
Telephone: (253) 924-3746
Fax: (253) 924-6182
E-Mail: Jennifer.hale@weyerhaeuser.com

October 16, 2007

Mr. Sam Chummar
Remedial Project Manager
U.S. Environmental Protection Agency – Region 5
Superfund Division – Remedial Response Branch #1
77 W. Jackson Blvd. (SR-6)
Chicago, IL 60604

**Subject: Response to U.S. EPA Comments on the Plainwell Mill Banks
Multi-Area Quality Assurance Project Plan Addendum
Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site**

Dear Sam:

This letter is in response to the October 11, 2007, comment letter provided to Weyerhaeuser Company (Weyerhaeuser) by the U.S. EPA, for the Multi-Area Quality Assurance Project Plan (QAPP) Addendum for the Plainwell Mill Banks Emergency Response Activities. The draft Multi-Area QAPP was submitted by RMT, Inc. (RMT), to the U.S. EPA on June 21, 2007, on behalf of Weyerhaeuser Company. The Multi-Area QAPP Addendum for the Plainwell Mill Banks Emergency Action was provided to U.S. EPA for review on September 10, 2007. All of the initial worksheets provided as part of the Multi-Area QAPP, while applicable to the Plainwell Mill Banks Emergency Action, were not resubmitted as part of the Addendum. Rather, only worksheets that needed modifications specific to the Plainwell Mill Banks Emergency Action were provided in the September 10th submittal.

The two U.S. EPA comments are provided below in italics, along with responses and additional information in regular type. As indicated in the October 11, 2007, letter, the U.S. EPA will provide final approval of the Multi-Area QAPP Addendum upon review of the responses provided below.

1. Data validation/verification- In order to meet the Agency's Quality Assurance/Quality Control requirements, a third party must be responsible for data validation/verification.

In accordance with Superfund requirements, and consistent with the approved Emergency Response Plan for the 12th Street Landfill Former Powerhouse Channel Emergency Action and with on-going projects for USEPA in Region 4, validation of 100% of laboratory data will be performed by RMT, which is an entity independent of the laboratory. Tom Stolzenburg, or a designated qualified person with RMT, has been identified for the third party data validation/verification of the laboratory-generated analytical data. As described under "Documentation and Records" in QAPP Worksheet #14, the laboratory (WATS) will prepare and provide full "Contract Laboratory Program (CLP)-like" data packages. These data packages will be provided to the RMT Data QA Manager (Tom Stolzenburg), or his RMT designee, who will review and validate the data packages as described in Worksheets #34, #35, and #36 and in accordance with the U.S. EPA Contract Laboratory National Functional Guidelines for Organic Data Review (October 1999). Please also refer to Worksheets #6, #7, #31, #33, #34, and #37 of the Addendum for additional information regarding the Data QA Manager.

Mr. Sam Chummar
U.S. Environmental Protection Agency – Region 5
October 16, 2007
Page 2

2. *A summary table with the project action (requirements) limits, achievable laboratory detection and reporting limits for all analytes and compounds in all matrices (soil, water, etc.) should be provided.*

Worksheets #15-1 and #15-2 of the Multi-Area QAPP, submitted to the U.S. EPA in June 2007, contain the project action limits, laboratory detection limits, and laboratory reporting limits for all analytes and matrices. The information in these two worksheets is applicable to the Plainwell Mill Banks; however, the worksheets have not been revised since the June 2007 Multi-Area QAPP and were therefore not included in the September 2007 Addendum. Additional copies of these two worksheets are attached to this letter for your information.

Please contact me at 253-924-3746 to indicate whether the U.S. EPA requires additional information or whether this letter has satisfied the necessary requirements for final approval of the Multi-Area QAPP Addendum for the Plainwell Mill Banks Emergency Action.

Sincerely,

Weyerhaeuser Company



Jennifer Hale
Environmental Manager

cmk/attachments

cc: Eileen Furey, C-14J
James Saric, SR-6J
Mickael Berkoff, SR-6J
Alida Roberman, SRT-4J
Paul Bucholtz, MDEQ
Kathy Huibregtse, RMT, Inc.

QAPP Worksheet #15-1
Reference Limits and Evaluation (Surface Water)

ANALYTE	CAS NUMBER	PROJECT ACTION LIMIT ⁽¹⁾	WATER (µg/L) ⁽²⁾	
			LABORATORY MDL	LABORATORY RL
PCBs (U.S. EPA 608) ⁽³⁾				
Aroclor - 1016	12674-11-2	--	0.10	0.2
Aroclor - 1221	11104-28-2	--	--	0.2
Aroclor - 1232	11141-16-5	--	--	0.2
Aroclor - 1242	53469-21-9	--	--	0.2
Aroclor - 1248	12672-29-6	--	--	0.2
Aroclor - 1254	11097-69-1	--	--	0.2
Aroclor - 1260	11096-82-5	--	0.10	0.2
Total PCBs	1336-36-3	0.2 µg/L	--	0.2
Inorganics (Wet Chemistry) ⁽⁴⁾				
TSS (U.S. EPA 160.2)	--	30-45 mg/L	--	5.0 mg/L ⁽⁵⁾
Total phosphorus as P (U.S. EPA 365.2)	--	--	--	0.01 mg/L

Footnotes:

⁽¹⁾ Standards are consistent with the Multi-Area Quality Assurance Project Plan (Rev. 00) For the Kalamazoo River Study Group (Arcadis BBL, 2007b), which are from the MDEQ's Substantive Requirements Document for the Plainwell Dam Superfund Site, dated February 13, 2007. The TSS standards are on a monthly and daily basis, respectively.

⁽²⁾ Concentrations are in µg/L, except where noted.

⁽³⁾ U.S. EPA. *Appendix A to Part 136 Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater Method 608—Organochlorine Pesticides and PCBs*. July 1995.

⁽⁴⁾ U.S. EPA. *Methods for Chemical Analysis of Water and Wastes*. EPA/600/4-79/020. EMSL-Cincinnati. 1983.

⁽⁵⁾ The actual Reporting Limit will depend on the volume of sample filtered.

Notes:

RL = reporting limit.

MDL = Method Detection Limit.

µg/L = micrograms per liter.

mg/L = milligrams per liter.

PCBs = polychlorinated biphenyls.

QAPP Worksheet #15-2
Reference Limits and Evaluation (Soil/Sediment)

ANALYTE	CAS NUMBER	PROJECT ACTION LIMIT ⁽¹⁾ (mg/kg)	SOIL AND SEDIMENT(μg/kg) ⁽²⁾	
			LABORATORY MDL	LABORATORY RL
PCBs (U.S. EPA 8082) ⁽³⁾				
Aroclor - 1016	12674-11-2	--	--	10
Aroclor - 1221	11104-28-2	--	--	20
Aroclor - 1232	11141-16-5	--	--	10
Aroclor - 1242	53469-21-9	--	--	10
Aroclor - 1248	12672-29-6	--	--	10
Aroclor - 1254	11097-69-1	--	--	10
Aroclor - 1260	11096-82-5	--	--	10
Total PCBs	1336-36-3	4 mg/kg	NA	20

Footnotes:

⁽¹⁾ Project action limit is based on the direct contact criterion for residential sites (MDEQ Part 201 Generic Cleanup Criteria and Screening Levels, January 23, 2006)

⁽²⁾ The target reporting limit is based on wet weight. The actual reporting limit will vary based on sample weight and moisture content.

⁽³⁾ U.S. EPA. Office of Solid Waste and Emergency Response. *Test Methods for Evaluating Solid Waste*, SW-846 3rd Edition. Washington, DC. 1996.

Notes:

RL = reporting limit.

MDL = Method Detection Limit.

$\mu\text{g/kg}$ = micrograms per kilogram.

PCBs = polychlorinated biphenyls.

NA = not applicable.